

**Kelkar, Mukul S.**

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**From:** andrew@thetexastrialawyers.com  
**Sent:** Wednesday, May 24, 2017 5:26 PM  
**To:** Kelkar, Mukul S.  
**Cc:** 'Mike Lowenberg'  
**Subject:** RE: Case No. 3:15-CV-03968-M - Malibu Media v. Jenna Howard  
**Attachments:** STX2 - Plaintiff's Second Set of Requests for Production.pdf; STX2 - Plaintiff's Second Set of Interrogatories.pdf

Mr. Kelkar,

Pursuant to my previous email, please find the attached additional discovery. If you have any questions please let us know.

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**From:** [andrew@thetexastrialawyers.com](mailto:andrew@thetexastrialawyers.com) [<mailto:andrew@thetexastrialawyers.com>]  
**Sent:** Monday, May 22, 2017 3:14 PM  
**To:** 'Kelkar, Mukul S.' <[mukul.kelkar@dentons.com](mailto:mukul.kelkar@dentons.com)>  
**Cc:** 'Mike Lowenberg' <[mike@thetexastrialawyers.com](mailto:mike@thetexastrialawyers.com)>  
**Subject:** Case No. 3:15-CV-03968-M - Malibu Media v. Jenna Howard

Mr. Kelkar,

After a lengthy discussion, Malibu has decided that the contents of the Additional Evidence and the matches to Defendant and her spouse were too significant to ignore. Dismissal is something Malibu would not agree to without proper examination of Defendant's computer hard drives. I am in the process of preparing additional Requests for Production which seek these electronic devices but wanted to provide you with an update. In order to proceed with discovery on this important issue, we may need to eventually modify the discovery schedule. Since expert reports will be needed, we would of course agree to an extension of Defendant's deadlines as well. I will be sending you the new discovery shortly along with some proposed new deadlines which would allow the parties to adequately conduct discovery on the hard drives.

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